

*Eli Richardson*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

VIMALA LLC, dba ALECIA et al.,

Plaintiffs

v.

WELLS FARGO BANK, N.A. et al.,

Defendants.

No. 3:19-cv-0513

Judge Eli J. Richardson

Magistrate Judge Jeffery S. Frensley

**BARHAM & MAUCERE LLC'S MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO THE SPECIAL MASTER'S MOTION FOR FEES**

Now comes Barham & Maucere LLC ("Counsel"), for the firm and its attorneys appearing in this action, pursuant to LR 83.01(e) and requests an enlargement of time to respond to the Special Master's "Motion" in this matter (Doc. 208) (hereinafter "Motion"). See Exhibit A attached hereto.

On February 3, 2022 Special Master Scott Cooper (or someone acting for Mr. Cooper) apparently filed the Motion, a declaration in support of the Motion (Exhibit B), and exhibits in support of the declaration (Exhibit C) (together "Motion"). The Motion was filed with ECF, but Counsel were not served a copy. However, in an abundance of caution and subject to an ongoing objection as to service, Counsel requests additional time to respond.

In his Motion for Fees, the Special Master argues that Counsel, as counsel for Plaintiffs, be issued a "contempt citation" and that the Court order "Counsel (Barham & Maucere) to pay Plaintiffs' share of the Special Master's fees." (Motion paras. 2 and 3). In support of this argument, the Special Master makes generalized and unsupported allegations and insinuations that Counsel is responsible for certain alleged actions by Plaintiffs.